

THE HONORABLE THOMAS S. ZILLY

U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

STRIKE 3 HOLDINGS, LLC, a Delaware  
corporation,

Plaintiff,

vs.

JOHN DOE, subscriber assigned IP  
address 73.225.38.130,

Defendant.

JOHN DOE subscriber assigned IP  
address 73.225.38.130,

Counterclaimant,

vs.

STRIKE 3 HOLDINGS, LLC,

Counterdefendant.

No. 2:17-cv-01731-TSZ

**DECLARATION OF SON OF JOHN  
DOE IN SUPPORT OF MOTION TO  
QUASH AND FOR PROTECTIVE  
ORDER**

I, son of JOHN DOE subscriber assigned IP address 73.225.38.130, declare as follows:

1. I respectfully submit this declaration in support of my Motion to Quash and for Protective Order in the above-captioned matter. I have personal knowledge of the facts set forth in this declaration, and could testify competently to them if called upon to do so.

1           2.       I am not a party to this lawsuit. My father is the defendant, JOHN DOE subscriber  
2 assigned IP address 73.225.38.130.

3           3.       On or about March 13<sup>th</sup>, my father told me that a man had given him paperwork  
4 that was apparently intended for me. I later learned that this man was a process server who was  
5 trying to serve a subpoena on me. I never spoke to the process server. I only learned about this  
6 after my dad tried to chase down the process server to return the paperwork. I was likely asleep  
7 during that time, because my father only told me about it much later that evening. I have the  
8 same name as my dad, so I believe my dad did not realize that the subpoena was intended for me  
at first.

9           4.       I know very little about the facts of this case. I do not monitor my father's use of  
10 his personal computer. I do not use his computer. When my dad talks to me about this lawsuit, I  
11 believe he withholds information to prevent causing me anxiety. We never discuss the details or  
12 nuts-and-bolts of what the lawsuit is about.

13           5.       If I was forced to show up for a deposition in this case, it would cause me a lot of  
14 anxiety. I experience a lot of anxiety about many things, especially when dealing with the  
15 unknown. Talking to strangers is very difficult for me. I do not like to drive cars and I constantly  
16 worry about how other people on the road can run into me. I tend to imagine how anything I do  
can fail and if it is going to fail, I do not want to do it because the anxiety is too much to handle.

17           6.       My anxiety has affected my life in a lot of different ways. I was never been able  
18 to hold down a job, but have not had a job in about ten years. I rarely leave my house and spend  
19 most of the time in my own room. I try to contribute to the household in ways that I can, even if  
20 it's only a little.

21           I declare under penalty of perjury under the laws of the United States of America that the  
22 foregoing is true and correct.

23  
24           (signature page to follow)

EXECUTED at Auburn, Washington, this 21st day of March, 2019.

Son of John Doe  
Non-Party Son of JOHN DOE